

503-99/EEL

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Plaintiffs
Maersk, Inc. and A.P. Moller-Maersk A/S
80 Pine Street
New York, NY 10005
(212) 425-1900
(212) 425-1901 fax

Eric E. Lenck
Lawrence J. Kahn

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MAERSK, INC. and A.P. MOLLER-MAERSK A/S,

Plaintiffs,

05 CIV 4356 (CM)

-against-

NEEWRA, INC., REDNIHOM, INC., AREF HASSAN ABUL
INC., ARWEEN SINGH SAHNI a/k/a ARWEEN SAHNI SINGH
a/k/a ARWEEN SAHNI a/k/a ARWEEN SINGH a/k/a ABUL
SABAH a/k/a AREF HASSAN ABUL, MOHINDER SINGH
SAHNI a/k/a MOHINDER SAHNI SINGH a/k/a MOHINDER
SAHNI a/k/a MOHINDER SINGH a/k/a MOHINDER SINGH
SAHANI a/k/a MOHINDER SAHANI a/k/a MOHINDER
SAHANI SINGH a/k/a JOGINDER SINGH SAHNI, JOGINDER
SINGH SAHNI a/k/a JOGINGER SINGH SAHNI a/k/a
JOGINDER SAHNI SINGH a/k/a JOGINGER SAHNI SINGH
a/k/a JOGINDER SINGH a/k/a JOGINDER SAHNI a/k/a
JOGINDER SINGH a/k/a JOGINGER SAHNI, SABHARWAL
CHANDRA KUMAR a/k/a SABHARWAL K. CHANDRA,
MANDEEP SINGH SAHNI a/k/a MOHINDER SINGH a/k/a
MOHINDER SAHNI a/k/a MOHINDER SINGH SAHNI a/k/a
MOHINDER SAHANI a/k/a MOHINDER SINGH SAHANI,
HELP LINE COLLECTION CO. W.L.L., PARKER DAWOOD
TAJUDDIN TAJUDIS ISMAIL PARKER, SARDAR TRADERS
EST., SARDAR INTERNATIONAL TRADING CO., AL
TAMASOK AL ARABI EST., JOHN DOE 1-100 (fictitious) and
JOHN DOE INC. 1-100 (fictitious),

**NOTICE OF
MOTION**

Defendants.

-----X
SIRS:

PLEASE TAKE NOTICE that Plaintiffs Maersk, Inc. and A.P. Moller-Maersk
A/S (collectively, "Maersk"), by their attorneys Freehill Hogan & Mahar, LLP, upon the

annexed Rule 56.1 Statement, the Affirmation of Lawrence J. Kahn together with all accompanying exhibits, and the pleadings and proceedings previously had herein, WILL MOVE THIS COURT, before the Honorable Colleen McMahon, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 21-B, New York, New York, at a time and date to be established by the Court, for summary judgment, together with such other, further and different relief as the Court may deem just and proper in the premises, against the following defendants:

- Joginder Singh Sahni (and aliases)
- Help Line Collection Co. W.L.L.
- Parker Dawood Tajuddin Tajudis Ismail Parker

PLEASE TAKE FURTHER NOTICE that pursuant to the Individual Practice Rules of Judge McMahon, opposing papers, if any, are to be served two weeks after receipt of the instant moving papers, and that reply papers, if any, are to be served five (5) business days later.

Dated: New York, New York
March 31, 2009

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Plaintiffs
Maersk, Inc. and A.P. Moller-Maersk A/S

By: 

Eric E. Lenck
Lawrence J. Kahn
80 Pine Street
New York, NY 10005
(212) 425-1900
(212) 425-1901 (fax)

TO: Harry H. Wise, III, Esq.
Law Offices of Harry H. Wise, III
*Attorneys for Defendants Joginder Singh Sahni, Parker Dawood and Help Line
Collection Co. W.L.L.*
250 West 57th Street, Suite 1316
New York, NY 10107

Raymond Connell, Esq.
Law Offices of Raymond Connell
Attorneys for Defendant Mohinder Singh Sahni
132 Nassau Street, Suite 900
New York, NY 10038